

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: LATEX GLOVES PRODUCTS : MDL DOCKET NO. 1148  
LIABILITY LITIGATION :  
: ALL CASES

**CASE MANAGEMENT ORDER NO. 30**  
**RE: MOTIONS TO DISMISS AND AFFIRMATIVE**  
**DEFENSES OF BAXTER INTERNATIONAL INC.**  
**AND ALLEGIANCE CORPORATION**

Baxter International Inc. and Allegiance Corporation have filed motions to dismiss or affirmative defenses claiming a lack of personal jurisdiction over them, in various state and federal latex allergy cases throughout the United States. Plaintiffs' Lead Counsel and Defendants' Liaison Counsel-Spokesperson believe it is desirable to consolidate discovery on these issues, so far as is practicable, within the pending MDL proceedings.

AND NOW, this 16th day of March 1998, in consideration of the foregoing recommendation, the following procedures shall apply in connection with the motions to dismiss and affirmative defenses filed by Baxter International Inc. and Allegiance Corporation relating to alleged lack of personal jurisdiction:

1. All discovery related to the Baxter International Inc.'s and Allegiance Corporation's claims of lack of personal jurisdiction is hereby consolidated in MDL No. 1148. The parties in all state latex allergy cases where such a claim is or may be alleged are encouraged to participate in such consolidated discovery.

2. Discovery will take place as follows:

Deadline

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|----|--|----------------|
| a. | Defendants Baxter International Inc. and Allegiance Corporation will provide plaintiffs' counsel documents and related information that those defendants believe relevant to the issue of lack of personal jurisdiction. | March 27, 1998 |
| b. | Plaintiffs may serve written discovery requests seeking additional information relevant to the issue of lack of personal jurisdiction.   | April 3, 1998  |
| c. | Defendants will respond to any such written discovery requests.  | April 17, 1998 |
| d. | Plaintiffs will conclude Rule 30(b)(6) depositions of defendants relevant to the issue of lack of personal jurisdiction.   | May 8, 1998    |

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Edmund V. Ludwig, J.